

EXHIBIT A



Gmail

Gregory Parry v. Hospice of Michigan, Inc., et al.; Case No. 2:22-cv-11328-DPH-DRG

1 message

Tara Lank <lank@sppplaw.com>

Tue, Apr 18, 2023 at 5:04 PM

To: dderomedi@dickinsonwright.com, adelmastro@dickinsonwright.com

Cc: Sarah Prescott <prescott@sppplaw.com>, Annemarie Smith-Morris <smith-morris@sppplaw.com>, Ken Mogill <kmogill@bignet.net>

Dear Counsel,

Please see the attached document from Sarah Prescott regarding the above-referenced matter.

Thank you.

--

Sincerely,

Tara Lank

Legal Assistant

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2 attachments



Stip and Order [proposed] 04.18.23.docx

27K



Letter to counsel [sent] 04.18.23.pdf

155K



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April 18, 2023

Sent via First-Class Mail and Email

David R. Deromedi
Angelina Rose Delmastro
DICKINSON WRIGHT PLLC
500 Woodward Ave., Suite 4000
Detroit, MI 48226
dderomedi@dickinsonwright.com
adelmastro@dickinsonwright.com

Re: *Gregory Parry v. Hospice of Michigan, Inc., et al.*
Case No. 2:22-cv-11328-DPH-DRG

Dear Counsel,

Based on your Docket No. 25, Response to [23] Motion to Compel Discovery, you have again committed to produce answers to Interrogatories 1 and 2, and Requests for Production 3, 6, 8, 9, 10, 11, 12, 13, 14, 15, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 31, 34, and 36. That being the case, an order to that effect should be unobjectionable and readily satisfiable. I have enclosed just such a proposed order, which can narrow the issues between our clients, for your review and which allows a generous *additional* 30 days to comply. Please let me know if you will agree.

Best,
SALVATORE PRESCOTT
PORTER & PORTER, PLLC

/s/ 

Sarah Prescott

SP/tl

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

GREGORY PARRY,

Plaintiff,

v.

Case No. 2:22-cv-11328-DPH-DRG

Hon. Denise Page Hood

HOSPICE OF MICHIGAN, INC., *a*
Michigan non-profit corporation, et al.,

Defendants.

Sarah S. Prescott (P70510)
Annemarie Smith-Morris (IL 6336786)
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STIPULATED ORDER

The parties having convened, by and through their attorneys, hereby stipulate to the following:

1. Defendant Hospice of Michigan, Inc. (“HOM”) shall produce without

objection full and complete responses to Interrogatories 1 and 2, and Requests for Production 3, 6, 8, 9, 10, 11, 12, 13, 14, 15, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 31, 34, and 36 in full at its earliest opportunity, but in no event later than May 18, 2022.

WHEREFORE, IT IS HEREBY ORDERED that Defendant HOM shall produce without objection full and complete responses to Interrogatories 1 and 2, and Requests for Production 3, 6, 8, 9, 10, 11, 12, 13, 14, 15, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 31, 34, and 36 in full at its earliest opportunity, but in no event later than May 18, 2022.

IT IS SO ORDERED.

Dated:

/s/

Hon. Denise Page Hood,
United States District Court Judge

Stipulated and Approved for Entry:

/s/ Sarah S. Prescott

/s/

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Dated: April 18, 2023

Dated: